

DECLARATION OF JULIA LYNNE RANDOLPH

I, Julia Lynne Randolph, make this declaration based on my personal knowledge and declare under the penalty of perjury, pursuant to 28 U.S.C. § 1746(1), that the following is true and correct to the best of my knowledge.

1. My name is Julia Lynne Randolph. I am a third year law student at the University of Florida Levin College of Law. I am currently a law student intern at Las Americas Immigrant Advocacy Center (“Las Americas”) in El Paso, Texas.

2. As part of this internship, I was working on Daniel Enrique Zacarias Matos’s (“Mr. Zacarias”) bond case under the supervision of Jorge Dominguez, an attorney at Las Americas. From my interviews with Mr. Zacarias, I learned that he is an asylum seeker from Venezuela. He entered the U.S. on or around December 2023 with his 8-year-old daughter. Around October 14, 2024, he was detained by ICE and taken to the El Paso Service Processing Center, an ICE detention center in El Paso, Texas. He was in asylum proceedings at the El Paso SPC Immigration Court while he was detained.

3. I have been in frequent communication with Mr. Zacarias’s sister and current guardian of his minor daughter, Betsabe Del Carmen Zacarias Matos (“Betsabe”). On Sunday morning, March 9, 2025, I received a message from Betsabe that she had just received notice from her brother that he was going to be transferred to another detention center. Betsabe stated that her brother had called her around 6:00 a.m., stating that he had been sent to collect his things because he was being transferred.

4. Throughout the day of Sunday, March 9, I searched the ICE detainee locator using Mr. Zacarias’s A-number and country of birth. That evening, I searched it again and noticed that Mr. Zacarias’s location had changed to El Valle Detention Center.

5. On Thursday, March 13, 2025, around 3:00 p.m., Betsabe texted me, stating that Mr. Zacarias called her and said that ICE officers told him that tomorrow everyone at El Valle Detention Center would be deported, except for four people who would be taken to another detention center.

6. On March 14, 2025, around 11:00 a.m., Betsabe told me that the men detained at El Valle Detention Facility were about to be deported on a plane. Mr. Zacarias told her he did not know if the

plane was going to Mexico or Venezuela but that they ultimately did not get on the plane because it did not pass an inspection. Betsabe told me that the officials told him that he was in their hands, that they could deport him, and that they were waiting on another plane.

7. Betsabe told me that Mr. Zacarias told the officers that he did not want to be deported but that he was on the list of those on the plane. Mr. Zacarias further explained that they had been returned after the plane didn't pass inspection. Betsabe further stated that Mr. Zacarias told her that the officials told him that the new flight would be later tomorrow or Sunday. Mr. Zacarias told Betsabe that they had changed their clothes and when Daniel said that he was in another process with his bond and couldn't go.

8. In the morning and early afternoon of March 14, 2025, I repeatedly called ICE to inquire about Mr. Zacarias's transfer, but I was not able to get an ICE officer on the line. Eventually, I was able to make contact with an ICE official at the Port Isabel Detention Center after asking a receptionist at one of the ICE offices in the area for the number for the deportation officers in charge of El Valle. When I called, I spoke to a male ICE official. I asked him for more information regarding what Mr. Zacarias was told about imminent transfer or deportation. He informed me that the last thing he saw on Mr. Zacarias's court records was a master calendar hearing reset. I confirmed with him that El Valle Detention Center was in their jurisdiction and that ICE operates the deportation flight, not private contractors. The official stated it was correct that if Mr. Zacarias was going to be on a deportation flight, he would see the details.

9. I also called the clerk at the El Paso SPC Immigration Court, where Mr. Zacarias's case was, to see if the case had been transferred. The clerk informed me that on Wednesday, March 12, an Immigration Judge had approved ICE's change of venue motion to move his proceedings to the Port Isabel Immigration Court.

10. That same day, around 2:00 p.m., Betsabe told me that Mr. Zacarias called her again, and said that the officials wanted to deport him and the other detainees to Venezuela and would not let them call their lawyers.

11. Later that afternoon, around 4:30 p.m., Betsabe texted me that Mr. Zacarias had called her and said that he was leaving tomorrow. When I asked Betsabe where he was going, she stated that he told her he was going to be deported under an order from the government. Betsabe stated that Mr. Zacarias was crying during the phone call and that the officials told him to be ready to leave early tomorrow morning.

12. Around 7:00 p.m., I clarified the nature of the order that Mr. Zacarias was told that an officer told him that they would be leaving voluntarily for Venezuela again because it is an order from the president. And that even if he doesn't sign a voluntary departure order, they will sign for him and that the order from the president is to deport them all. And that they are the first flight that leaves early.

I declare that the foregoing in this document is true and correct to the extent of my personal knowledge.

Signature Date